

## REMARKS

In the present amendment, claims 1-18 have been canceled and new claims 19-36 have been added. Entry of these amendments and consideration of the presently pending claims is earnestly solicited in light of the following remarks.

### Response to the 35 U.S.C. §102 Rejection

Claims 1-5, 7-11, and 13-17 were rejected under 35 U.S.C. §102(e) as being anticipated by *Varma* (U.S. Patent No. 6,336,134). Upon entry of this amendment canceling these claims, this rejection is rendered moot. With respect to newly added claims 19-36, Applicants respectfully assert that *Varma* does not teach or suggest every feature of the new claims. For at least this reason, Applicants contend that a *prima facie* case of anticipation cannot be established using the *Varma* reference. The Examiner is therefore kindly requested to withdraw this rejection.

### ***Claim 19:***

Independent claim 19 is directed to a system for “***verifying the synchronization***” between a local application and a remote application. Claim 19 recites “***window synchronization verification logic***” that is configured to verify that the applications are synchronized by monitoring aspects of windows in the respective applications. Although *Varma* provides synchronization of the work spaces on remote clients, the reference does not teach “verifying” or checking that the work spaces on each client are actually synchronized. *Varma* provides a partition server that sends out modification entries for synchronizing remote applications, but the system does not teach or suggest verifying or ensuring that the remote clients are actually synchronized. If the Examiner continues to hold to a position that *Varma* “verifies” synchronization, then it is respectfully requested that the Examiner clearly specify where the prior art teaches such a feature and what rationale is used to come to this conclusion.

Even assuming, for the sake of argument, that “verification” is inherent in the synchronization process of *Varma*, this reference still fails to disclose verifying synchronization based on aspects of the windows in the applications. The Examiner seems to suggest in the Office Action that *Varma*’s partition are equivalent to windows. However, according to col. 5, lines 39-63 of *Varma*, it is clear that this is

not the case and that partitions are portions of an application that can be individually modified and are not the same as the windows as defined in the claims and disclosure of the present application. *Varma* fails to verify synchronization based on aspects of the windows and fails to even acknowledge the windows in the applications. For at least these reasons, Applicants believe that independent claim 19 is allowable over *Varma*.

Independent claim 19 further defines the window as having aspects that are monitored in order to verify synchronization between the applications, thereby further distinguishing the present application from *Varma*. For instance, claim 19 recites that each local application window comprises an "index" that is used for identification purposes. Also, each remote application window comprises an "index" that corresponds to the index of a corresponding local application window. The window synchronization verification logic verifies synchronization ***"by correlating the indexes of the at least one local application window with the indexes of the at least one remote application window."*** Support for this claim feature can be found in the present specification on p. 8, line 20 to p. 9, line 7. *Varma* does not monitor aspects of windows in the respective applications and therefore fails to further provide logic to verify synchronization based on a correlation between indexes in local and remote application windows, as claimed.

Reciting another aspect of the windows that can be monitored to verify synchronization, claim 19 additionally includes verifying synchronization ***"by monitoring the number of local application windows and the number of remote application windows."*** Support for this claim feature can be found in the present specification on p. 9, lines 8-20. *Varma* does not teach the analysis of windows and does not develop any concept of verifying synchronization by monitoring the number of windows in the applications of respective clients. Instead, *Varma* appears to merely record the history of modification entries from the different clients made during the collaboration session for bringing a newly participating client up to speed and does not proactively verify that the number of windows in remote applications are the same.

**Claim 25:**

Independent claim 25 is directed to a method for ***“verifying the synchronization”*** between a local application and a remote application. This claim recites ***“verifying that the local application and remote application are synchronized”*** in response to various aspects of windows in the respective applications. Although *Varma* provides synchronization for remote clients, *Varma* does not verify that the work spaces on each client are actually synchronized, as claimed.

The verifying step of claim 25 verifies synchronization in response to a comparison of the number of windows in each application and a correlation between indexes of corresponding windows in each application. Assuming arguendo that verification is inherent in *Varma*’s synchronization process, *Varma* still fails to disclose verifying synchronization based on the claimed steps of a) ***“correlating the indexes of the at least one local application window with the indexes of the at least one remote application window”*** and b) ***“comparing the number of local application windows with the number of remote application windows.”*** Applicants therefore believe, for at least these reasons, that independent claim 25 is allowable over *Varma*.

**Claim 31:**

Independent claim 31 is directed to a system for ***“verifying the synchronization”*** between a local application and a remote application. Again, this claim is concerned with verifying synchronization, not merely providing the information necessary for synchronization in hopes that the applications will be synchronized. Claim 31 further recites ***“means for verifying synchronization.”*** Although *Varma* provides synchronization of the work spaces on remote clients, the reference does not verify or check that the work spaces on each client are actually synchronized.

Aspects of the windows are monitored in order to verify the synchronization between the applications. For instance, claim 31 recites that each local application window and each remote application window comprises an “index.” Each index of the remote application windows corresponds to an index of a corresponding local application window. The system comprises ***“means for matching the indexes of the local application windows with the indexes of the remote application windows to***

*correlate the local application windows with corresponding remote application windows.*” Again, support for this claim feature can be found in the present specification on p. 8, line 20 to p. 9, line 7. *Varma* fails to disclose means for matching indexes of windows to correlate the local application windows with the remote application windows. This correlation may be used to verify synchronization between the two applications.

Furthermore, other aspects of the windows may be used for synchronization verification. In this regard, claim 31 includes “*means for monitoring the number of local application windows*” and “*means for monitoring the number of remote application windows.*” Again, support for this claim feature can be found in the present specification on p. 9, lines 8-20. In contrast to claim 31, *Varma* merely records the history of modification entries and does not disclose means for monitoring the number of windows in the applications of respective clients. Therefore, *Varma* is incapable of proactively verifying that the number of windows in remote applications are the same.

***Claims 20-24, 26-30, and 32-36:***

Dependent claims 20-24, 26-30, and 32-36 are believed to be allowable for at least the reason that these claims depend from allowable independent claims 19, 25, and 31. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).

In the Office Action mailed August 7, 2003, the Examiner suggests that *Varma* includes several elements that were the same as the elements of the canceled dependent claims. Applicants contend that the Examiner’s statements concerning *Varma* are incorrect and that more is read into this reference than what is actually there. Applicants believe that the new dependent claims include substantially similar subject matter as the originally filed dependent claims and that they further separate the present invention from *Varma*.

It should be noted that clarification of the meaning of “synchronization verification” can be found in dependent claim 24, which defines the aspect of “verifying” synchronization by reciting logic that takes action when the applications are not synchronized. For instance, when the applications are not synchronized, the application input suppression logic suppresses input to the windows of the local and remote applications. Also, the local message generation logic generates a message of

failed synchronization if the windows are not synchronized. Although *Varma* appears to teach a system that is capable of synchronizing remote applications, this reference does not ensure or monitor whether the remote applications are synchronized and therefore does not teach that any action is performed based on a possibility that the applications may not be synchronized.

The aspect of “verifying” synchronization is also defined more specifically in claim 30 in which inputs are suppressed and a synchronization failure message is displayed when the windows are not synchronized. *Varma* does not verify whether the remote applications are synchronized and therefore does not teach that any action is performed based on the possibility of unsynchronized applications.

Dependent claim 36 also supports this concept of “verifying” synchronization by providing “means for suppressing input” if the windows are not synchronized and “means for generating a message” indicating that the windows are not synchronized. Again, *Varma* does not check or monitor whether the remote applications are synchronized and is therefore silent about taking any action based on the possibility of unsynchronized applications.

***Response to Examiner's Arguments:***

The Examiner states that part of the “collaboration procedure is to ensure that the respective partitions are synchronized...” At least a few things are incorrect or misleading about this statement. First, *Varma* does not specifically “ensure” that synchronization is maintained. If the Examiner believes that *Varma* includes such a teaching, the Examiner is respectfully requested to provide specific reference to it or explain the rationale behind this belief. Second, the Examiner seems to equate partitions with windows. It should be noted that these elements are not the same. If the Examiner believes that partitions are windows, then such an allegation with supportive reasoning should be provided. Third, Applicants assert that the Examiner is reading more into *Varma* than what is explicitly or implicitly stated. *Varma* does not discuss various ways that synchronization is achieved. *Varma* does not constantly check and recheck various parameters related to history servers. Even if it did, this would still be considered a moot argument because the claims of the present application do not actually include this limitation.

Response To 35 U.S.C. §103 Rejection

Claims 6, 12, and 18 were rejected under 35 U.S.C. §103 as being unpatentable over *Varma* (U.S. Patent No. 6,336,134) in view of *Katsurabayashi* (U.S. Patent No. 6,308,199). Upon entry of the amendment herein, including the cancellation of these claims, this rejection is rendered moot. However, regarding the new claims, Applicants respectfully assert that *Katsurabayashi* fails to overcome the deficiencies of *Varma*, as mentioned above, with respect to independent claims 19, 25, and 31. For at least this reason, Applicants believe that all claims are allowable over the combination of *Varma* and *Katsurabayashi*.

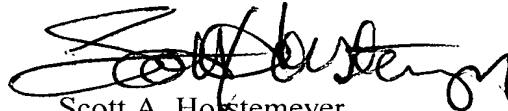
Applicants disagree with the Examiner's statement that *Katsurabayashi* discloses a system wherein "a check is made as to whether or not synchronization is established." and further processing of information "is based on the notification of whether or not the synchronization is established and the systems are notified as to the status of the system; see col. 9, lines 49-63." *Katsurabayashi* does not do the things that the Examiner alleges. *Katsurabayashi*, when taken as a whole, is directed to a cooperative work system for sharing applications in which the ability is provided to select windows to be displayed and windows to be hidden for each user. No check is made whether synchronization is established and no indication is made about whether or not the applications are synchronized.

Furthermore, Applicants disagree with the Examiner's statement that "it would have been obvious to a person of ordinary skill in the art at the time this invention was made to have provided the system of *Varma*, with failed synchronization notification, as taught by *Katsurabayashi*..." First, the references do not include the aspects as the Examiner alleges. Second, no motivation exists in the prior art to modify *Varma* as the Examiner suggests. Although it would indeed be desirable to provide notice to the system of failed synchronization, this desirability is not taught or suggested in the prior art. Instead, this teaching is only found in the present application and claims, for which a patent should be issued.

### CONCLUSION

In light of the foregoing amendments and for at least the reasons set forth above, Applicant respectfully submits that all rejections have been traversed, and that the pending claims 19-36 are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

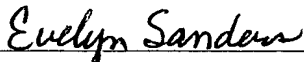


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